

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF WISCONSIN
MILWAUKEE, WISCONSIN

FILED
2014 APR 30 AM 10:09
US BANKRUPTCY COURT
EASTERN DISTRICT OF WI

In re:

LAYTON & HOWELL
SANDWICH KINGS, INC.

Chapter 11 Case
Case No: 14-24439

Debtor

**OBJECTION TO US TRUSTEE'S MOTION TO DISMISS DEBTOR'S PETITION
DUE TO DEBTOR'S INABILITY TO FIND COUNSEL**

William J. Foley, sole shareholder of the debtor, temporarily, in lieu of an attorney, files this Motion for Contempt and for Sanctions against Attorney Joan Shepard and Christian Kramer for violation of Rule 362 "The Automatic Stay".

INTRODUCTION

Sandwich Kings, LLC. was organized in 2005 as a corporation that would operate as "The Original Suburpia" a new millennium incarnation of the "Suburpia Submarine Sandwich Shoppes" of the 60's and 70's, that was founded in 1967. A lawsuit was filed in Milwaukee County Circuit Court in April 2013. The Plaintiffs are Christian Kramer, Marietta Duncan and Sandwich Kings, LLC.

EXTENUATING CIRCUMSTANCE

The debtor filed for protection 4/15/14 using Special Form #2 with the intention of hiring an attorney quickly.

Though debtor filed on 4/15/14, Circuit Judge Richard J, Sankovitz held hearing in his courtroom Branch 29, Room 500, on 4/24/14 though William J. Foley had also filed on 4/15/14. Despite Foley's absence, the Court put every issue on the

record, then Judge Sankovitz adjourned the hearing until after the conclusion of Foley's Chapter 11. The judge then posted the entire transcript of the pointless hearing of CCAP. Every attorney, before accepting a client, checks CCAP; if you check william J Foley on CCAP, you will find the Sankovitz hearing, that violates Rule 362, but also serves to dissuade possible attorneys because Sankovitz's looks complex though debtor and Foley have only two creditors, the IRS and the DOR.

Debtor asks for a continuance on the US Trustee's motion to dismiss due to the additional time to find counsel as a result of the "billboard" on CCAP.

As another possibility, because of the environment that CCAP has created, might the Court consider appointing an attorney?